

UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION

KELLY CAHILL, SARA JOHNSTON,

LINDSAY ELIZABETH, and HEATHER)

HENDER, individually and on)

behalf of others similarly)

situated,)

10 | Plaintiffs,)

11 | v.) 3:18-cv-01477-JR

12 NIKE, INC., an Oregon)

13 corporation,)

14 Defendant.)

DEPOSITION OF PAIGE AZAVEDO

January 29, 2021

Friday

10:02 A.M.

21 THE VIDEOCONFERENCE VIDEO-RECORDED

22 DEPOSITION OF PAIGE AZAVEDO was taken at Portland,
23 Oregon, before Jan R. Duiven, CSR, FCRR, RPR, CRC,
24 Certified Shorthand Reporter in and for the State
25 of Oregon.

1	kind of a discussion about where their passion	11:32:15
2	kind of lied. You know, Daniel, in particular,	11:32:18
3	you know, that was -- he was really into men's	11:32:24
4	training and football and that type of thing so it	11:32:26
5	made sense for him to align there.	11:32:28
6	Danielle was really, really focused on	11:32:30
7	women's initiatives and that was a big passion of	11:32:34
8	hers. So I tried to align -- and we -- you know,	11:32:37
9	it was -- it was a conversation that -- that we	11:32:40
10	had over the course of not only the recruiting	11:32:43
11	process, but also as part of, you know, their	11:32:46
12	development within the organization.	11:32:50
13	As opportunities came up, it was a	11:32:53
14	conversation that we would have about, you know,	11:32:55
15	where -- where did they see themselves, you know,	11:32:57
16	kind of wanting to fit in and work.	11:32:59
17	Q. Okay. And who would decide which	11:33:05
18	accounts they would focus on?	11:33:07
19	A. That was -- that was my role as their	11:33:08
20	leader.	11:33:11
21	Q. Okay. So sounds like you would	11:33:16
22	consider like their -- their interest and	11:33:17
23	experience in figuring out where to slot them in?	11:33:19
24	A. That's right.	11:33:24
25	Q. And for the individuals we mentioned,	11:33:25

1 did you hire any of them for your team? You 11:33:32
2 mentioned recruitment. 11:33:37

3 MR. BLAKE: Objection. Vague. 11:33:38

4 A. Yeah. Every single one of them I 11:33:40
5 hired onto my team. 11:33:41

6 BY MS. ZABELE: 11:33:43

7 Q. Oh, okay. So I know we spoke earlier 11:33:43
8 about promotions for Tracy White and Danielle 11:33:53
9 Weiss from marketing specialist to manager. So 11:34:00
10 maybe just focusing on Ms. White, did you hire her 11:34:05
11 into the marketing specialist role on your team? 11:34:09

12 A. That is my recollection, yes. 11:34:13

13 Q. Do you recall when it was? It was 11:34:17
14 probably a long time ago, but to the extent you 11:34:25
15 can. 11:34:27

16 A. Yeah. I don't. It would have been -- 11:34:27
17 it would have been early in that -- in that move 11:34:30
18 over to DTC. So if I look at my resume, it would 11:34:34
19 have been in that 2011-2012 time period. 11:34:38

20 Q. Okay. And if you can recall, what 11:34:45
21 factors did you consider in deciding to hire 11:35:03
22 Ms. White for the marketing specialist role? 11:35:08

23 A. Yeah. My recollection is that she had 11:35:11
24 a pretty good resume from external sources. So 11:35:15
25 she came from, I believe, a radio station where 11:35:19

1	she was doing a lot of their digital work, even	11:35:22
2	did some kind of on-camera -- sorry, on-microphone	11:35:25
3	work, and I believe she also had come recommended	11:35:30
4	by somebody within the organization as somebody	11:35:35
5	to -- to -- to talk to.	11:35:38
6	So there was a number of factors, both	11:35:41
7	her experience, you know, her -- her prior digital	11:35:43
8	experience and then her ability to communicate,	11:35:49
9	which was really important when you're getting in	11:35:52
10	front of accounts.	11:35:54
11	Q. Okay. Any other factors you	11:36:00
12	considered in deciding to hire Ms. White?	11:36:02
13	A. No.	11:36:08
14	Q. Okay. And let's see. What about	11:36:09
15	Kerry Blake? Did you hire her into the -- into a	11:36:19
16	marketing specialist role on your team?	11:36:23
17	A. I did.	11:36:25
18	Q. Do you recall when that was?	11:36:27
19	A. It would have been around the same	11:36:30
20	time period. Probably -- she was a bit after --	11:36:33
21	after Tracy. So probably, you know, either late	11:36:38
22	2011 or into 2012.	11:36:42
23	Q. And what factors did you consider that	11:36:47
24	you can recall in deciding to hire Tracy into the	11:37:01
25	marketing specialist role?	11:37:08

1	A. You mean Kerry?	11:37:09
2	Q. Kerry. Yeah. Sorry. Kerry.	11:37:11
3	A. It's okay. So Kerry -- Kerry actually	11:37:13
4	was -- what I remember is she's a Stanford grad	11:37:16
5	who was doing all of their digital work from a	11:37:21
6	basketball perspective. So she was -- she was	11:37:24
7	their digital kind of specialist within the	11:37:28
8	Stanford org.	11:37:31
9	She was also somebody who came as an	11:37:35
10	internal recommendation from the -- the basketball	11:37:37
11	team, somebody they had interviewed and didn't end	11:37:42
12	up having a spot for her, and so they felt like	11:37:49
13	she would be a good fit if we had another role	11:37:52
14	open. So that was -- that's my recollection of	11:37:54
15	how she -- she came into the mix.	11:37:56
16	Q. Okay. Anything else?	11:38:12
17	A. No.	11:38:14
18	Q. And what about Chelsea Gunter? Did	11:38:16
19	you hire her into a marketing specialist role on	11:38:24
20	your team?	11:38:26
21	A. Yes.	11:38:27
22	Q. Do you recall when that was?	11:38:30
23	A. It probably would have been in the	11:38:31
24	2012 time period as well.	11:38:34
25	Q. Okay. What factors did you consider	11:38:42

1	in deciding to hire Ms. Gunter?	11:38:45
2	A. Chelsea -- I actually can't remember	11:38:51
3	the conversations that we had. I believe she was	11:38:54
4	part of a -- my recollection is that Chelsea was	11:38:56
5	part of just a basic loop. You know, there was a	11:38:59
6	bunch of candidates that we were looking for -- we	11:39:04
7	were looking to hire from a bunch -- kind of a	11:39:06
8	list of candidates.	11:39:10
9	She came in and interviewed, and --	11:39:13
10	and my recollection is that she just felt like a	11:39:15
11	good fit for Nike and she felt like a good fit for	11:39:17
12	the team and the role.	11:39:20
13	So, yeah, I think that was just part	11:39:22
14	of kind of the interview process that -- that --	11:39:24
15	that worked.	11:39:27
16	Q. And when you say, "She felt like a	11:39:28
17	good fit for Nike," what do you recall about that?	11:39:37
18	Like what would make someone a good fit for Nike?	11:39:40
19	A. It was just passion --	11:39:43
20	Q. Or what -- sorry. I'll strike.	11:39:44
21	What made Ms. Gunter a good fit for	11:39:46
22	Nike?	11:39:48
23	A. Yeah. Yeah. She was really	11:39:48
24	passionate about sport. She was passionate about,	11:39:50
25	you know, women's sport in particular, and -- and,	11:39:52

1 she was -- you know, she was somebody who was 11:40:02
 2 very -- from -- from the conversations we had, and 11:40:03
 3 then subsequently in the role, she was, you know, 11:40:06
 4 someone who was very kind of detailed oriented 11:40:08
 5 and -- and -- and really -- really good with -- 11:40:11
 6 with her ability to kind of communicate with 11:40:17
 7 relationships. 11:40:20

8 Q. Makes sense. Anything else? 11:40:26

9 A. No. 11:40:31

10 Q. And I guess like thinking broadly, not 11:40:35
 11 just about Ms. Gunter in particular, but was 11:40:39
 12 whether a candidate would be a good fit for Nike 11:40:43
 13 something you would consider for generally like 11:40:47
 14 all candidates when you interviewed them? 11:40:50

15 A. Yeah. I mean, you know, there's 11:40:53
 16 always a -- going back to kind of the Nike 11:40:55
 17 principles and making sure that there's -- you 11:40:59
 18 know, that they -- they feel right against those 11:41:02
 19 key principles that Nike has. And, you know, for 11:41:06
 20 me, also just being able to -- to have a passion 11:41:11
 21 for sport and -- and know that, you know, athletes 11:41:15
 22 and the -- and that world is something that they 11:41:19
 23 care about. 11:41:22

24 Q. When you mentioned the Nike's key 11:41:27
 25 principles, what are those? 11:41:43

1	A. Oh, I'd have to go back and look.	11:41:44
2	It's like "do the right thing" and, you know --	11:41:47
3	it's been a while. I used to be able to recite	11:41:52
4	them by memory. But, you know, customer	11:41:54
5	obsession. Now -- now I'm mixing between my	11:41:59
6	current role and Nike, but, you know, it's the "do	11:42:03
7	the right thing" and -- I -- I'd have to go back	11:42:05
8	and -- and refresh on them, but it's -- it's all	11:42:13
9	of the kind of core attributes that Nike uses	11:42:16
10	to -- as part of their hiring process.	11:42:20
11	Q. Okay. And you would assess candidates	11:42:23
12	against those principles when you're making hiring	11:42:28
13	decisions?	11:42:31
14	A. Absolutely.	11:42:31
15	Q. Okay. You also -- let's see. I just	11:42:33
16	want to check to make sure I'm not repeating	11:42:49
17	myself.	11:42:51
18	Okay. So maybe how about Daniel	11:42:59
19	Cogan? Did you hire him into a marketing	11:43:04
20	specialist role on your team?	11:43:06
21	A. I did.	11:43:08
22	Q. Recall when that was?	11:43:08
23	A. Around the same time period. He was a	11:43:11
24	little bit later than the others, if I recall. So	11:43:12
25	probably 2012-ish.	11:43:15

1	Q. Okay. And what factors did you	11:43:19
2	consider in hiring Mr. Cogan into the marketing	11:43:24
3	specialist role?	11:43:33
4	A. Yeah. With Daniel in particular, my	11:43:33
5	recollection is he had been working at Adidas	11:43:35
6	doing a very similar role there already. So he	11:43:38
7	had the relevant experience. And -- and so --	11:43:40
8	and, again, had a -- had a big passion for sport	11:43:46
9	and for the categories that we were hiring into in	11:43:50
10	particular, which at the time were training and	11:43:53
11	football. So he -- he was -- so he was somebody	11:43:56
12	that -- that, again, he had the experience.	11:43:58
13	Q. Anything else?	11:44:03
14	A. No.	11:44:06
15	Q. So when you mentioned that he worked	11:44:08
16	at Adidas, I'm thinking not just related to	11:44:18
17	Mr. Cogan, but more broadly to the -- all of the	11:44:24
18	employees that you hired, would you consider like	11:44:27
19	the type of experience, prior work experience that	11:44:31
20	someone had like with certain -- working at a	11:44:37
21	certain place being more relevant to what you were	11:44:41
22	hiring for versus others?	11:44:43
23	MR. BLAKE: Vague and ambiguous.	11:44:46
24	A. It -- yeah. I mean, all the folks on	11:44:47
25	my team came from very diverse backgrounds as I	11:44:50

1 mentioned. You know, Kerry came from, you know, a 11:44:57
2 college role. Tracy came from a radio station. I 11:45:01
3 don't recall Chelsea's role before. You know, 11:45:07
4 Daniel came from Adidas. 11:45:13

5 So from my perspective, there was -- 11:45:14
6 there were key criteria that cut across, and it 11:45:17
7 was, you know, do -- do you -- do you meet the 11:45:22
8 sort of criteria and needs that -- that are 11:45:25
9 established by the -- the Nike key principles? Do 11:45:27
10 you -- you know, do you have a passion for the 11:45:32
11 brand and for the -- the sports and -- and for 11:45:35
12 sports, and do you then have a specific abilities 11:45:41
13 for the -- for these particular roles? 11:45:45

14 So, you know, can you build 11:45:47
15 relationships with accounts? Can you -- can you 11:45:49
16 work across the matrix and -- and build strategic 11:45:53
17 plans? Can you execute against those plans? And 11:45:59
18 can you show me examples of where you've been able 11:46:03
19 to do that? 11:46:05

20 So -- I -- I would say just by virtue 11:46:05
21 of the -- where each of these came from, I was not 11:46:09
22 looking for experience from specific companies at 11:46:13
23 all. It was more about their experience and their 11:46:16
24 ability to do the role. 11:46:19

25 (Reporter inquiry.) 11:46:27

1 THE WITNESS: She was -- she 11:46:28
2 actually came from -- my recollection is that she 11:46:29
3 was a Stanford graduate who was doing -- she was 11:46:32
4 being -- she was their digital specialist or 11:46:36
5 digital social person on -- for their basketball 11:46:38
6 or athletic department. 11:46:43

7 MS. ZABELE: So sorry. Maybe I'll 11:46:52
8 just ask for the record. Jan, were you able to 11:46:53
9 record Ms. Azavedo's answer for -- I believe I 11:46:59
10 asked her what factors she considered when hiring 11:47:02
11 Kerry Blake into the role? I'm just wondering if 11:47:04
12 we're covered here or if I should reask it. 11:47:09

13 THE REPORTER: I think I got it. I 11:47:20
14 just didn't hear the -- I think the word I missed
15 was Stanford. 11:47:22

16 MS. ZABELE: Ah, okay. No problem. 11:47:22

17 BY MS. ZABELE: 11:47:28

18 Q. Okay. And let's see. Also, Danielle 11:47:28
19 Weiss? Did you hire her for your team in a 11:47:41
20 marketing specialist role? 11:47:46

21 A. I did. 11:47:47

22 Q. Do you remember when that was? 11:47:50

23 A. Around the same time, 2012-ish. I 11:47:51
24 think she was one of my -- 11:47:59

25 | Q Okay And -- 11:48:00

1	A. One of my early hires, so it would	11:48:01
2	have been either 2011 or 2012.	11:48:03
3	Q. And what factors did you consider in	11:48:06
4	deciding to hire Ms. Weiss for the marketing	11:48:12
5	manager -- marketing specialist position?	11:48:15
6	A. Yeah. So Danielle was a little bit of	11:48:17
7	a unique situation in that she was actually	11:48:19
8	working in one of our agencies as a program	11:48:22
9	manager working with us on -- on some different	11:48:24
10	agency work. So she was our -- she was our	11:48:29
11	account manager on the other side.	11:48:31
12	And when the role came open, because	11:48:34
13	we had had such a great relationship with her and	11:48:38
14	was able to view her abilities face -- you know,	11:48:41
15	directly because of the work she was doing on our	11:48:45
16	account. We -- you know, she was interested in	11:48:48
17	coming to Nike.	11:48:51
18	We interviewed her alongside other --	11:48:53
19	other candidates, to my recollection, and -- and	11:48:55
20	so she was somebody that -- that we felt very	11:48:59
21	confident hiring because we had done -- again, had	11:49:01
22	direct access to her work on our behalf.	11:49:04
23	(Reporter inquiry.)	11:49:14
24	THE WITNESS: Sorry. And it's not	11:49:14
25	Schindler. It's Streicher. It's Streicher-Weiss.	11:49:19

1	Danielle Streicher. S-T-R-E-I-C-H-E-R. And then	11:49:20
2	she's hyphenated now. Weiss, W-E-I-S-S.	11:49:25
3	I apologize. It's not Schindler.	11:49:29
4	I'm getting a couple -- it's -- it's	11:49:32
5	Streicher-Weiss.	11:49:36
6	BY MS. ZABELE:	11:49:36
7	Q. That's okay. If you -- yeah. If at	11:49:37
8	any point you realize like you need to correct any	11:49:39
9	other names or anything like that, just speak up.	11:49:44
10	A. Okay. Thank you.	11:49:47
11	Q. No problem. Okay. Any other	11:49:48
12	individuals that you recall hiring when you were	11:50:01
13	in the director of digital NA role?	11:50:04
14	A. Yeah. I hired Ryan McDonald	11:50:07
15	(phonetic) and Stephanie Gray are the other two,	11:50:10
16	and then Lauren Anderson.	11:50:13
17	Q. Okay. Maybe let's start with Ryan	11:50:19
18	McDonald. What role did you hire him for?	11:50:27
19	A. He was our -- he was our --	11:50:36
20	responsible for our kids category. So primarily	11:50:39
21	accounts like Kids Foot Locker and Dick's Sporting	11:50:42
22	Goods and their kids' business. Or young	11:50:47
23	athletes, I guess.	11:50:51
24	Q. And did you hire him for a marketing	11:50:53
25	manager or a marketing specialist role?	11:50:58

1	A. Marketing specialist.	11:51:01
2	Q. And do you recall when you hired him	11:51:04
3	into the marketing specialist role?	11:51:16
4	A. I -- I don't, and the reason I can't	11:51:18
5	recall exactly is that he worked for us, I	11:51:25
6	believe, as a temp, sort of -- a temp employee for	11:51:28
7	a while, and then we were able to transition him	11:51:34
8	into a full-time role. And so I don't remember	11:51:37
9	exactly what part of his work was temp and when --	11:51:42
10	versus when he was full time.	11:51:48
11	Q. Okay. So he was -- okay. So he was	11:51:51
12	employed with another company and like on	11:52:01
13	assignment at Nike?	11:52:05
14	A. Yeah. My -- my recollection is that	11:52:06
15	we brought him in originally as -- as a -- as a	11:52:08
16	temporary worker, ETW, and -- and then were able	11:52:12
17	to transition his role into a full-time head	11:52:22
18	position.	11:52:26
19	Q. Okay. And what factors did you	11:52:31
20	consider in deciding to hire Mr. McDonald into the	11:52:33
21	marketing specialist role?	11:52:38
22	A. Again, kind of similar to Danielle.	11:52:39
23	He was someone who, you know, we were able to see	11:52:41
24	him working on the -- on the job through his	11:52:44
25	temporary -- ETW role. And so based on that, we	11:52:47

1 were able to -- to -- to feel confident about his 11:52:51
2 ability to do the job and to come into Nike as 11:52:55
3 a -- as a full-time employee to -- to do the -- to 11:52:59
4 step into that kids' role, kids' marketing role. 11:53:04
5 Q. Okay. Anything else? 11:53:11
6 A. No. 11:53:12
7 Q. All right. And you mentioned 11:53:16
8 Stephanie Gray. Is it G-R-A-Y? 11:53:19
9 A. G-R- -- I think it is an A, yes. 11:53:25
10 Q. Okay. And did you hire her into a 11:53:31
11 marketing specialist role as well? 11:53:36
12 A. I believe she was a marketing 11:53:45
13 specialist, yes. 11:53:46
14 Q. And did she -- when she became a 11:53:50
15 marketing specialist on your team, did she have a 11:54:00
16 particular group of accounts that she was 11:54:04
17 responsible for? 11:54:06
18 A. Yeah. She -- I -- I can't remember 11:54:08
19 exactly what the -- the overlap was, but she kind 11:54:16
20 of came in to manage -- I believe our -- some of 11:54:19
21 our training categories, the men's training work. 11:54:28
22 That's my recollection. 11:54:34
23 And the reason we brought her in is 11:54:39
24 that she had been doing a bunch of -- I believe 11:54:42
25 she worked either by contract or directly with 11:54:45

1	Microsoft doing some large-scale event work with	11:54:50
2	them, digital event and physical events. And we	11:54:53
3	knew -- I knew that we were going to have, with	11:54:58
4	training in particular and -- and events like	11:55:01
5	Super Bowl, that there was a potential for us	11:55:04
6	to -- to need someone to -- to engage with our	11:55:05
7	training team on -- and our accounts on what that	11:55:10
8	could look like.	11:55:13
9	So she -- she fit the bill from that	11:55:13
10	perspective because she had some good, kind of	11:55:16
11	on-the-ground event-specific work with Microsoft.	11:55:18
12	Q. What's a digital event?	11:55:35
13	A. I believe she, you know, would send	11:55:37
14	out social campaigns and, you know, create --	11:55:42
15	create registrations for people to come onsite	11:55:50
16	through digital means. So, you know, you could --	11:55:55
17	you could sign up and register to be part of the	11:55:57
18	event that was -- that was happening in a specific	11:56:00
19	location, that type of thing. I don't exactly	11:56:02
20	recall what she was doing, but that was my	11:56:04
21	recollection, is that she did some kind of	11:56:07
22	large-scale event planning with them that	11:56:09
23	happened --	11:56:12
24	Q. Oh, okay.	11:56:13
25	A. That happened digitally and	11:56:13

1	physically.	11:56:15
2	Q. And when she joined your team, did she	11:56:16
3	do digital and physical events for Nike?	11:56:22
4	A. She was -- she was responsible for our	11:56:26
5	digital work specifically.	11:56:29
6	Q. Okay. And when you say she was	11:56:48
7	responsible for your digital work specifically, is	11:57:06
8	that like as compared to something else?	11:57:09
9	A. No. You just asked me if she did	11:57:12
10	physical and she was responsible for digital, not	11:57:15
11	physical events.	11:57:17
12	Q. I see. Okay. Thanks.	11:57:19
13	Okay. And I think I might not have	11:57:42
14	asked you yet what factors you considered in	11:57:46
15	deciding to hire Ms. Gray as a marketing	11:57:48
16	specialist on your team.	11:57:52
17	A. Yeah. Again, she was -- I knew of her	11:57:54
18	experience with Microsoft and doing similar work	11:57:57
19	with them, and so the -- you know, she seemed like	11:58:01
20	a good fit for the role that we were looking for.	11:58:05
21	Q. Got it. Anything else?	11:58:12
22	A. No.	11:58:13
23	Q. Okay. And then you mentioned Lauren	11:58:15
24	Anderson.	11:58:21
25	A. Yeah.	11:58:22

1	Q. And Ms. Anderson's an opt-in plaintiff	11:58:24
2	in this case. Correct?	11:58:27
3	A. That's right.	11:58:28
4	Q. Okay. What role did you hire	11:58:29
5	Ms. Anderson for?	11:58:33
6	A. She was hired in as a director, and	11:58:34
7	what I recall is she was -- she was going to be	11:58:45
8	more of a senior leader on my team to manage -- to	11:58:47
9	come in and manage -- we were kind of moving	11:58:52
10	accounts around, so she was -- I believe she was	11:58:58
11	coming in to manage the Eastbay account	11:58:59
12	specifically.	11:59:02
13	Q. Okay. And I think Ms. Anderson was	11:59:05
14	already working at Nike at the time that you hired	11:59:19
15	her. Correct?	11:59:22
16	A. That's right.	11:59:22
17	Q. So I guess when you hired her into	11:59:24
18	your group, was that a -- like a lateral? Would	11:59:28
19	that have been considered a lateral move?	11:59:31
20	A. Yes. Lateral move from a -- I would	11:59:33
21	say a smaller category. I think she was in the	11:59:37
22	golf team at the time into a larger kind of	11:59:39
23	opportunity. So from a scope perspective, it was	11:59:43
24	a larger scope, but a lateral move from an HR	11:59:47
25	perspective.	11:59:51

1	Q. Got it. And when you say that it was	11:59:53
2	a larger scope as compared to the golf team, how	11:59:58
3	so?	12:00:01
4	A. Eastbay's business is -- at the time	12:00:02
5	was multi, multimillions of dollars with Nike.	12:00:05
6	You know, they were one of our biggest accounts.	12:00:11
7	They were moving quickly with us. And so, you	12:00:14
8	know, I think from a scope perspective, they cover	12:00:17
9	every category, not just one category. And so the	12:00:20
10	role was -- was pretty -- pretty complex and in	12:00:25
11	depth.	12:00:31
12	Q. And maybe I'll just close up for her.	12:00:31
13	What factors did you consider in deciding to hire	12:00:46
14	Ms. Anderson onto your team in the director role?	12:00:52
15	A. You know, with Lauren, there's a few	12:00:55
16	different pieces. One, you know, we interviewed	12:00:57
17	and her and she seemed like, you know, passion,	12:01:00
18	capability, able to do the job just from the --	12:01:05
19	from the Nike principles.	12:01:09
20	And then I would say a couple other	12:01:10
21	things. We had history. Right? We had all of	12:01:12
22	her coaching for excellence documentation so we	12:01:14
23	were able to look back and see what that -- see	12:01:18
24	what -- what -- how she had performed over the	12:01:22
25	course of her tenure at Nike.	12:01:25

1 And then she came highly recommended 12:01:26
 2 by an internal team member, Cindy King, who knew 12:01:29
 3 her well and recommended her as somebody to bring 12:01:33
 4 into the team. 12:01:35

5 Q. Okay. Any other factors that you 12:01:40
 6 considered in deciding to hire Ms. Anderson? 12:01:42

7 A. No. 12:01:45

8 Q. And did you tell me when that was that 12:01:48
 9 you hired her? 12:01:52

10 A. She -- 12:01:53

11 Q. I can't remember. 12:01:54

12 A. -- would have come in a little bit 12:01:55
 13 later, kind of towards the end of my time. Maybe 12:01:56
 14 in the 2013-2014. I can't recall exactly, but it 12:02:00
 15 was later than the others. 12:02:04

16 Q. Okay. And -- and I think you 12:02:08
 17 mentioned that -- you said, We had interviewed her 12:02:13
 18 or we interviewed her. Who else interviewed 12:02:16
 19 Ms. Anderson for the role that you can remember? 12:02:18

20 A. Cindy -- Cindy King did. My manager 12:02:23
 21 at the time -- I'll forget his name. Who was it? 12:02:25
 22 I can't -- I can't remember his name. He was not 12:02:31
 23 my manager for very long. So kind of the -- you 12:02:34
 24 know, the -- the key folks that she would be 12:02:39
 25 working with. 12:02:41

1 what factors did you consider in deciding to offer 12:14:03
 2 Ms. Anderson the \$108,000 as a starting salary in 12:14:09
 3 that director role? 12:14:14
 4 A. I -- I mean, for the most part, we -- 12:14:17
 5 I relied on HR to make those recommendations and 12:14:22
 6 very rarely questioned them. And so they made the 12:14:26
 7 recommendation. It seemed reasonable. And it 12:14:30
 8 was -- it was based on, you know, prior work 12:14:34
 9 experience and compensation. It gave her a good 12:14:38
 10 kind of reason to come over to the team if she was 12:14:42
 11 having any questions because it was an increase in 12:14:44
 12 salary. So that was -- that was all that goes 12:14:47
 13 into the decision. 12:14:49

14 Q. Got it. And do you recall approving 12:14:51
 15 compensation for the other members of your team 12:15:08
 16 that you hired that we've discussed? 12:15:13
 17 MR. BLAKE: Objection. Vague and 12:15:16
 18 ambiguous. 12:15:21
 19 A. Yes. Yes. I would have approved 12:15:21
 20 their salaries as part of the hiring process. 12:15:22

21 BY MS. ZABELE: 12:15:32
 22 Q. Okay. Okay. Anyone else you recall 12:16:16
 23 hiring on your team when you were in the director 12:16:17
 24 of digital NA role? 12:16:20
 25 A. Not that I recall, no. 12:16:23

1	Q. Did you ever make any hiring	13:37:25
2	recommendations or decisions for an employee at	13:37:26
3	Nike based on their gender?	13:37:29
4	MR. BLAKE: Objection. Vague and	13:37:32
5	ambiguous. Compound.	13:37:32
6	A. No. I never made a decision on hiring	13:37:33
7	based on gender.	13:37:38
8	BY MS. ZABELE:	13:37:41
9	Q. What about compensation? Did you ever	13:37:41
10	make any compensation decisions or recommendations	13:37:44
11	for an employee at Nike based on their gender?	13:37:46
12	MR. BLAKE: Objection. Vague and	13:37:48
13	ambiguous. Compound.	13:37:50
14	A. No.	13:37:51

15	BY MS. ZABELE:	13:37:54
16	Q. Oh. One thing I wanted to ask. When	13:38:05
17	you were the director of digital,	13:38:07
18	direct-to-consumer in that role at Nike from	13:38:09
19	October 2007 to May 2011, were there any employees	13:38:13
20	who were performing similar roles to yours?	13:38:17
21	A. Yeah. Jeff Lyman was in a very	13:38:19
22	similar role managing work and campaigns that	13:38:24
23	were -- that were similar to mine.	13:38:30
24	(Reporter inquiry.)	13:38:42
25	THE WITNESS: Yeah. It's L-Y-M-A-N.	13:38:43

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4 CERTIFICATE
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I, Jan R. Duiven, CSR, FCRR, CRC, RPR, a Certified Shorthand Reporter for the State of Oregon, do hereby certify that, pursuant to stipulation of counsel for the respective parties hereinbefore set forth, PAIGE AZAVEDO appeared virtually before me at the time and place set forth in the caption hereof; that at said time and place I reported in Stenotype all testimony adduced and other oral proceedings had in the foregoing matter; that thereafter my notes were reduced to typewriting under my direction; and that the foregoing transcript, pages 1 to 245, both inclusive, constitutes a full, true, and accurate record of all such testimony adduced and oral proceedings had, and of the whole thereof.

Witness my hand at Eugene, Oregon,
this 12th day of February, 2021.



Jan R. Duiven, CSR, FCRR, CRC, RPR

CSR No. 96-0327

Expiration Date: September 30, 2023

Cahill, et al v. Nike
 Paige Azavedo Deposition Errata

Page : Line	Reads	Should Read	Reason
132 : 16	Sysco	Cisco	To correct a transcription error
142 : 8	Yes	I'm not sure if the role exists today.	To clarify and correct an inadvertent error
169 : 20	Tim Parks	Tim Perks	To correct a transcription error
170 : 11	Tim Parks	Tim Perks	To correct a transcription error
219 : 20	Tim Parks	Tim Perks	To correct a transcription error
242 : 17	Bruce Stall	Bruce Stahl	To correct a transcription error

Subject to the above changes, I declare under the penalties of perjury of the laws of the United States that my deposition transcript is true and correct.

Executed on 03 / 12 / 2021 in Portland, OR.


Paige Azavedo

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